

### REMARKS

Claims 1-24 are pending in the above-identified application. Claims 1-24 were rejected. With this Response After Final, no claims are added, canceled, or amended. Accordingly, claims 1, 2, 4-6, 9, 10, 12-14, 17, 18 and 20-22 are at issue.

#### **I. 35 U.S.C. § 103 Obviousness Rejection of Claims**

Claims 1, 2, 4-6, 9, 10, 12-14, 17, 18 and 20-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Michael Man-Hak Tso* (U.S. Patent No. 5,706,509, hereinafter “*Tso*”) in view of *Multer et al.* (U.S. Patent No. 6,925,476, hereinafter “*Multer*”). Applicants respectfully traverse this rejection.

Applicants respectfully submit that *Tso* and *Multer*, alone or in combination, fail to teach or suggest every limitation of amended claim 1. For example, the cited references fail to teach “optimizing the sequence log of changes by detecting a creation operation and a deletion operation associated with the same file *and replacing the creation operation and the deletion operation with a reparent operation*” (emphasis added). The Examiner contends that *Tso* teaches the emphasized limitation at col. 12, ll. 59-65 and Fig. 4a. The cited text of *Tso* is repeated below:

If Rn is not marked UPDATE or CREATE, and in step 956 if Rn is marked DELETE, then in step 958 Rn is deleted in D1' (using the steps illustrated in FIG. 11a). In step 944, Rn is marked as DONE and the next record Rn in CL0 is processed. Back in step 928, if Rn is not marked as CREATE, then the general steps illustrated in FIG. 9c are followed.

Applicants respectfully submit that *Tso* says nothing there of a reparent operation, nor does it mention replacing a creation operation and deletion operation with a reparent operation. To the best of Applicants' knowledge, *Tso* does not disclose a reparent operation, or even the equivalent thereof, anywhere in the patent. If the rejection is maintained, Applicants respectfully request clarification on what the Examiner regards as the reparent operation, and precisely where *Tso* teaches replacing a creation and deletion operation with a reparent operation. "When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable." 37 C.F.R. § 1.104(c)(2). Applicants argued in the previous Amendment that *Tso* fails to teach the emphasized limitation. Applicants respectfully submit that the Examiner has failed to rebut that argument.

The Examiner does not contend that *Multer* teaches or suggest the emphasized limitation. However, Applicants note that *Multer* does not in fact teach or suggest this limitation. To the best of Applicants' knowledge, *Multer* does not disclose a reparent operation, or even the equivalent thereof, anywhere in the patent. Even if *Multer* did teach optimizing a sequence log of changes, which Applicants do not concede, *Multer* does not optimize the sequence log in the way presented in claim 1, *i.e.*, by "replacing the creation operation and the deletion operation with a reparent operation." Thus, the combination of *Tso* and *Multer* fails to teach or suggest every limitation of claim 1. Accordingly, *prima facie* obviousness has not been established, and the rejection should be withdrawn.

Claims 9 and 17 recite limitations similar to those of claim 1, and are therefore patentable for at least the same reasons as given for claim 1. Claims 2, 4-6, 10, 12-14, 18 and 20-22 depend

from claims 1, 9, and 17, and are therefore patentable for at least the same reasons as given for claims 1, 9, and 17.

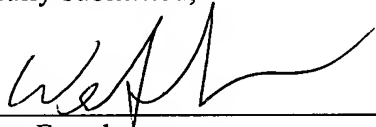
## II. Conclusion

In view of the above amendments and remarks, Applicants submit that all claims are allowable over the cited prior art, and respectfully request early and favorable notification to that effect.

Respectfully submitted,

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